

STATE OF NEW YORK  
PUBLIC SERVICE COMMISSION

At a session of the Public Service  
Commission held in the City of  
New York on December 15, 2004

COMMISSIONERS PRESENT:

William M. Flynn, Chairman  
Thomas J. Dunleavy  
Leonard A. Weiss  
Neal N. Galvin

CASE 97-C-0139 - Proceeding on Motion of the Commission to  
Review Service Quality Standards for Telephone  
Companies.

ORDER ESTABLISHING MODIFICATIONS TO THE  
INTER-CARRIER SERVICE QUALITY GUIDELINES  
FOR HOT CUT MEASUREMENTS AND STANDARDS

(Issued and Effective December 16, 2004)

BY THE COMMISSION:

On August 25, 2004, we issued the *Order Setting Permanent Hot Cut Rates* (the Hot Cut Order) which referred the development of hot cut metrics and standards to Case 97-C-0139 - the "Carrier to Carrier" (C2C) proceeding. It is in the C2C proceeding that members of the telecommunications industry and Department staff, collectively known as the Carrier Working Group (CWG), collaborate to propose modifications to the Inter-Carrier Service Quality Guidelines (C2C Guidelines), which govern the service quality standards of carrier-to-carrier services and measure company performance.

The Hot Cut Order required that the CWG attempt to reach agreement on hot cut metrics and standards within 60 days, or the parties would brief outstanding issues 21 days thereafter. After several productive sessions of the CWG, the

parties, on October 25, 2004, submitted to staff the framework for hot cut metrics and standards reached by the consensus determination of the group, and identified outstanding issues to be briefed by the parties and submitted to the Commission for determination. On November 15, 2004, briefs on non-consensus issues were filed by Covad, BridgeCom and Broadview (jointly), AT&T, MCI, MetTel, and Verizon.

Notice of our intent to modify the C2C Guidelines for the inclusion of hot cut metrics and standards was provided in SAPA 97C0319SA21, published September 22, 2004. No comments in response to the SAPA were received.

#### DISCUSSION

Modifications to the C2C Guidelines adopted here were developed by the consensus determination of the CWG, or based on the Commission's analysis of the issues raised by the parties in their non-consensus filings.

##### 1) Hot Cut Metrics and Standards Determined by Consensus

Members of the Carrier Working Group held several productive sessions in an attempt to consensually develop hot cut metrics and standards. Active participants in that effort included staff, Covad Communications Company (Covad), BridgeCom International, Inc. (BridgeCom), AT&T Communications of New York, Inc. (AT&T), Broadview Networks, Inc. (Broadview), Metropolitan Telecommunications, (MetTel), MCI, Inc. (MCI), Time Warner Telecommunications (Time Warner), XO Communications (XO), and Verizon New York, Inc. (Verizon). On October 25, 2004, the CWG submitted to staff its proposal for hot cut metrics and standards achieved by the consensus determination of the group. In its submission, included as Appendix 1 hereto, the CWG provided its consensus determinations on several hot cut metrics to be included in the C2C Guidelines and identified issues where consensus was not achieved (applicable consensus and non-

consensus passages are highlighted in Appendix 1). The consensus proposal included several new sub-metrics and recommended other significant modifications to the measurements and standards in the C2C Guidelines to improve hot cut performance. The modifications determined by consensus include:

- Modifying existing metrics, where applicable, to include Large Job and Batch Hot Cut processes;
- Including UNE-P to UNE-L and UNE-L to UNE-L migrations in applicable Hot Cut metrics;
- Modifying the measurement of the average interval offered to include Basic and Batch Hot Cuts (PR-1-13);
- Modifying the measurement and standard for Basic Hot Cut orders completed within 5 days (PR-3-08) and 10 days (PR-3-11);
- Expanding the measurement of installation quality performance to include Large Job and Batch Hot Cuts (PR-6-02);
- Redefining the measurement of on-time Basic Hot Cut completion performance, and expanding the definition to include Large Job and Batch Hot Cuts processes (PR-9);
- Developing cut-over windows for the completion of Batch Hot Cuts; and,
- Establishing a new sub-metric to measure the performance associated with completion of Large Job negotiations.

Since the submission of the consensus proposal on October 25, 2004, the CWG has identified three items in the proposal requiring clarification.<sup>1</sup> Appendix 1 reflects the incorporation of these clerical modifications.

The consensus recommendations of the CWG, as modified and attached as Appendix 1, which address the Commission's requirement to establish hot cut measurements and standards, and

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<sup>1</sup> The product in PR-9-01 is modified to read "Loop - Batch Hot Cut Loop", consistent with PR-6-02. PR-3-08 performance standard is changed to read "Basic Hot Cut Loops (1-10 Lines)." The title and numerator of PR-3-11 is modified to include Business Days."

enhance the C2C Guidelines in monitoring wholesale telephone service quality performance are approved.

2) Non-Consensus Hot Cut Metric Determinations

Despite the best efforts of the Carrier Working Group, several issues relating to Hot Cut measurements and standards were not resolved within the timeframe established by the Hot Cut order. These non-consensus issues were identified by the CWG and parties submitted briefs on those issues for our determination. Our determinations are stated below based on a careful analysis of the positions filed by the CWG parties.

a) PO-2: OSS Interface Availability

Verizon proposes to expand the existing metric that measures the availability of Verizon's OSS interfaces to include WPTS<sup>2</sup> and establish scheduled hours for the availability of WPTS.<sup>3</sup> Several CLECs, including AT&T, Bridgecom and MetTel propose an alternative proposal for prime time availability 24 hours a day, seven days a week. They claim that Verizon's proposal here is contrary to its commitments made in the Hot Cuts case to perform hot cuts 24/7.

It is reasonable to assume some down-time for updating and maintenance of electronic systems during non prime-time hours. Verizon's proposal is consistent with the availability of other OSS interfaces such as EDI, WEB GUI/LSI, CORBA and EB. We do not expect the scheduled non prime-time availability of Verizon's WPTS system will interfere with Verizon's scalability obligations for hot cuts. We expect that excessive down-time,

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<sup>2</sup> Wholesale Provisioning and Tracking System - an automated Verizon system used by Verizon and CLECs to communicate information relating to the status of hot cut orders.

<sup>3</sup> Verizon proposes prime time hours between 06:00:00 and 23:59:59 EST Monday through Saturday, excluding major Holidays

would generate complaints by CLEC users which would then necessitate appropriate remedies.

Verizon's proposal regarding WPTS prime-time hours (06:00:00 to 23:59:59 EST Monday through Saturday), which is consistent with other Verizon OSS systems, is approved.

b) OR-5: Percent Flow-Through

This metric measures the percent of valid orders received through Verizon's electronic ordering interface that are processed directly through to the legacy Service Order Processor system and confirmed without human intervention. Currently, this metric only measures performance on a total Resale and total UNE order basis.

Certain CLECs propose that this metric be modified to measure UNE-L or "Loop" products separately. ATT raises the concern that traditionally high flow-through rates associated with UNE-P orders could mask poor performance in UNE-L order flow-through rates. ATT, Bridgecom and Broadview also share the concern that lower UNE-P volumes due to the expected market shift from UNE-P to UNE-L would greatly impact performance in the aggregated measure and the ability to monitor UNE-L performance. MetTel claims that without disaggregation, the means to identify any problems in a timely fashion is limited. Verizon, Time Warner and Covad recommend no change to the existing measure.

Disaggregation of flow-through performance is reasonable so that UNE-L performance may be distinguishable from UNE-P activity. Given that volumes of UNE-L orders are expected to increase going forward, it is critical that UNE-L flow-through rate problems be identified early so that problems can be remedied. The CLEC proposal to disaggregate the flow-through metric to measure UNE-P, UNE-L, and UNE-Other separately, as opposed to the existing measurement of UNE-Total, is approved.

c) PR-1: Average Interval Offered

PR-1 measures the average interval offered for completed and cancelled orders. The completion of orders within a specified number of days is measured in a different metric, PR-3. The consensus determination established the measurement of the average interval offered for non-dispatched Basic Hot Cut orders greater than 20 lines, and for all Batch Hot Cut orders (PR-1-13).<sup>4</sup> For Basic Hot Cut orders under 10 lines, and between 10 and 20 lines, the interval is fixed at 6 and 10 days, respectively. Intervals for Basic Hot Cut orders greater than 20 lines are negotiated and intervals for Batch Hot Cut orders can range from 6 to 26 days, based on the amount of Batch Hot Cuts requested in a particular central office. The measurement of average intervals, rather than a standard interval, is appropriate for these products because the interval offered varies on an order by order basis. The PR-1-13 sub-metric is for monitoring purposes and does not include a performance standard.

An alternative proposal would expand the measurement of PR-1-05: Average Interval Offered (Dispatch) to include Batch Hot Cut orders within high volume, mid volume and low volume central offices. Verizon and several CLECs acknowledge that the alternative proposal was not fully developed by the CWG. The only CLECs supporting this metric are MCI, the sponsor, and MetTel. Because this modification was not fully developed by the CWG, we reject the alternative proposal to measure the average interval offered for Batch Hot Cut orders greater than 10 lines (disaggregated for high-volume, mid-volume and low-volume offices).

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<sup>4</sup> "Dispatch" and "No Dispatch" classification refers to whether or not a technician is required to be dispatched to the outside plant to complete the order.

d) PR-3: % Completed within Specified Number of Days

The existing C2C Guidelines include a metric to measure Basic Hot Cut order completion within 5 days, the standard interval offered, for orders less than 10 lines. One of the consensus determinations is a new sub-metric that measures Basic Hot Cut order completion for orders between 10 and 20 lines with a standard of 95% within 10 business days.

Verizon proposed an additional metric that would measure completed Large Job Hot Cut orders within 30 days. The alternative proposal, supported in whole or in part by all of the CLECs, would establish three other metrics for Large Job Hot Cut order completion within 15 days, within 26 days, and within 60 days. Broadview, the only participating CLEC with actual Large Job experience, reports that the usual completion interval offered by Verizon for Large Job completion is 15 days. Verizon claims that the 15 day interval is a general offering and not part of any obligation in the Large Job process approved by the Commission.

At issue here is the completion interval for Large Job Hot Cuts. Batch Hot Cut orders have an outer due date of 26 business days and are less expensive. The most desirable feature of the more expensive Large Job process is the CLEC's ability to control the date and time of the cut-over. The expected completion of the Large Job, based on current practice, is 15 days. Therefore, it is reasonable for the CLECs to expect that Large Job orders (unless otherwise requested) will be completed in an interval shorter than that of the outer-limit for the Batch, which is under Verizon's control. However, we find that the alternative proposal for a 99.5% standard is not a reasonable measure of performance for the primarily manual tasks associated with Large Job Hot Cut completions. Therefore, we will approve a standard of 98% for PR-3-14: % Large Job Hot Cut orders completed in 26 business days. While a measurement of

Large Job completion performance within 15 days is desirable, it is premature to require a commitment to that interval as line volumes may increase significantly based on expected or increased reliance on UNE-L. Monitoring of actual performance, as Verizon suggests, could produce more realistic performance expectations. Therefore, the CLEC proposal for PR-3-13, % Large Job Hot Cut orders completed in 15 business days is approved with no standard so performance can be measured for monitoring purposes. Verizon's proposal, to only measure % Completed in 30 days (PR-3-12) and the other alternative proposal (PR-3-15 % Completed within 60 Business Days) are rejected.

e) PR-5: Facility Missed Orders

The PR-5 metric measures the percent of orders completed after the committed due date due to a lack of facilities for various Verizon wholesale products. Hot cut orders are not specifically measured in this metric, but are included in the measurement POTS Loop - Total, which includes new Loop and Hot Cut orders.

An alternative proposal would expand the PR-5 metric to separately measure dispatched Batch Hot Cut orders where Integrated Digital Loop Carrier (IDLC) was present and no alternate facilities are found, completed more than 15 and 60 days after the missed appointment date. The alternative proposal is supported only by MCI, the sponsor, and MetTel. In its non-consensus brief, MCI acknowledges that the placement of its proposal in a "dispatch" metric was inappropriate, but contends that such a measure is still warranted to ensure that the presence of IDLC does not unnecessarily delay or increase the cost of Hot Cut orders.

According to Verizon's existing practices, the hot cut of an IDLC loop requires that the conversion of the loop to an available Universal Digital Loop Carrier (UDLC) or copper facility be coordinated with other hot cut activities. For that



reason, IDLC loops are not eligible for cut-over in the less coordinated Large Job and Batch Hot Cut processes. However, IDLC loops are eligible for cut-over in the Basic Hot Cut process approved by the Commission. Verizon's performance in the completion of Basic Hot Cut orders within a specified number of days, which may include IDLC loops, is already measured in the PR-3 metric. The alternative proposal to measure the percent of Batch Hot Cut orders completed after the commitment date due to lack of facilities caused by IDLC, is inconsistent with processes approved in the Hot Cut order and is, therefore, rejected.

f) PR-6: Installation Quality

The existing PR-6 metric measures troubles reported within 30 days and 7 days for various wholesale products, i.e., POTS-Loops, UNE-P, 2-Wire Digital, Specials, etc. While PR-6-01 measures performance for many wholesale products (including Hot Cuts included in the POTS - Total measurement) against parity with similar Verizon functions, PR-6-02 currently measures the Basic Hot Cut performance against a benchmark standard of 2% (percent of lines installed where a trouble is reported within 7 days). It was the consensus determination of the CWG that PR-6-02 be expanded to measure Large Job and Batch Hot Cut performance as well.

Verizon's proposal here, supported by TWTC, would remove Hot Cut orders from the PR-6-01 sub-metric, so that it would only include new POTS Loops (not Loops migrated via hot cut). It reasons that it is unnecessary to measure Hot Cut performance twice (PR-6-01 and PR-6-02) under different performance standards. Additionally, for PR-6-02, Verizon proposes to maintain the benchmark 2% for Basic Hot Cut orders, but proposes a parity standard for Large Job and Batch Hot Cut orders. Several CLECs (AT&T, BridgeCom, Covad, MetTel and MCI) object to the removal of Hot Cut orders from PR-6-01, some

claiming that removing a product more susceptible to problems (without raising the performance level for the remaining products) diminishes the objective of the measurement. For PR-6-02, all CLECs (except Broadview which offers no position) oppose Verizon's proposal for a parity measurement, most arguing that there are no Verizon Retail processes analogous to the Large Job Hot Cut or Batch Hot Cut processes. An alternate proposal supported by AT&T, BridgeCom, Covad MetTel and MCI, includes a 0.5% standard for PR-6-02 for all Hot Cut processes, while TWTC proposes that the 2% benchmark be applied to both measures.

As one CLEC party suggests, it is reasonable to assume that installation troubles associated with hot cuts are more likely to occur within 7 days. Hot Cut performance would be more appropriately measured in its own, separate metric, PR-6-02. Therefore, Verizon's proposal to remove UNE Loop Hot Cuts from PR-6-01 (% Installation Troubles reported within 30 Days) is approved. With regard to a performance standard for PR-6-02, the validity of the Verizon proposal for a parity standard for measuring Large Job and Batch Hot Cuts performance against Retail POTS is uncertain and remains in dispute, while the 0.5% standard proposed by the CLECs is unreasonable as the Large Job and Batch Hot Cuts processes have no measured experience yet. A reasonable solution, proposed by Time Warner, is to accept Verizon's existing 2% standard for Basic Hot Cuts and apply it also to Large Job and Batch Hot Cut performance. Therefore, a performance standard of 2% is approved for PR-6-02 for Basic, Large Job and Batch Hot Cuts.

g) PR-9: Hot Cut Loop Metrics

Where PR-3 measures the completion of wholesale orders (including Hot Cuts) within X days from the date of order application, the PR-9 metrics exclusively measure on-time Hot Cut order completion within a window on the date the Hot Cut is

due. The CWG was able to develop by consensus several significant modifications to the PR-9 metrics consistent with the intent of the Hot Cut Order, such as: redefining Hot Cut completion commitments, expanding the metric to include Large Job and Batch Hot Cut performance, including UNE-L to UNE-L migrations in performance measurements, and establishing cut-over windows for Basic Hot Cuts. The CWG was also able to reach consensus on the creation of a measurement (but not the associated performance standards) for a new sub-metric to measure Large Job negotiation periods.

i) Performance Standard for Large Job Cut-over Window

For on-time Hot Cut performance in PR-9, Verizon's commitment to the frame due time<sup>5</sup> (FDT) is usually measured against the actual completion of the entire Hot Cut order (and not the individual lines within the order). Large Job Hot Cuts or "Projects" can be comprised of several orders and the completion of the order may span several days. Unlike Basic and Batch Hot Cuts, cut-over windows are not established for Large Job Hot Cuts. The start time of the Large Job is determined by negotiation between the CLEC and Verizon, but the completion time is assigned by default regardless of when lines or orders within a Project are actually cut or completed.<sup>6</sup>

Verizon does not propose cut-over intervals for Large Jobs, rather, it proposes to measure on-time performance against its ability to complete the project prior to the default FDT. An alternative proposal (supported by AT&T, BridgeCom,

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<sup>5</sup> Frame due time is the actual time cut-over is scheduled to begin at the Main Distributing Frame in the central office.

<sup>6</sup> By default, a completion time of 11 PM (on the negotiated date(s) the project is to be completed) is assigned to all orders within the project.

Broadview, Covad, MetTel and MCI) is to establish a performance standard in PR-9 for Large Job cut-overs based on the total number of lines in the Large Job or Project. Verizon claims that significant changes to existing operational processes and systems would be required to measure performance of completed Large Job or Project by lines within a given time frame. Time Warner supports a standard and measurement for Large Job and recommends that CWG (and a sponsored operational group) explore modifications required before this measurement can be implemented.

While the alternative proposal to establish a completion window for Large Job Hot Cut orders is desirable, a method to capture completion of a Large Job or Project by line size as suggested by the alternative proposal and the required operational and system modifications were not fully developed by the CWG. Therefore, the alternative proposal for a performance standard for a Large Job cut-over window is rejected at this time, but the implementation of such a performance standard should be explored further by the CWG. Therefore, we urge the CWG to sponsor an operational group to design the required modifications necessary to implement a future measurement.

ii) PR-9-01: % On Time Performance - Hot Cut

PR-9-01 is the sub-metric that measures on-time performance of Hot Cut orders completed on the due date within the specified cut-over window. The existing metric only included standards for the cut-over interval for Basic Hot Cut orders. The consensus determination expanded this metric to measure all three Hot Cut processes and, similar to Basic Hot Cut intervals, the CWG developed cut-over intervals for Batch Hot Cut orders based on line size. As stated above, cut-over intervals for Large Job Hot Cuts have yet to be established so on-time completion performance is measured against a default FDT.

At issue here is the performance standard for the PR-9-01 sub-metric. Verizon proposes to maintain a 95% standard for on time performance for the completion of Basic Hot Cuts. It claims that standards above 95% are inappropriate for metrics that measure manual processes. The alternative proposal, supported by AT&T, BridgeCom, Broadview, MetTel and MCI, is for a 99.5% standard. AT&T comments that such a high standard is necessary to be consistent with Hot Cut Order's expectation of "error free" hot cuts. Broadview and BridgeCom argue that current cut-over intervals are generous, and a higher standard is justified to ensure timely hot cuts, as intended by the order.

Typically in the past, where the parties have not agreed on an absolute standard, or where the measurement involved strictly manual processes, a 95% performance standard is applied. In approving Verizon's process for WPTS Basic, Large Job and Batch Hot Cuts, we determined that activities associated with the cut-over of loops, albeit more streamlined and efficient, remain primarily manual. The expected increase in volumes of hot cuts, especially in the untested Large Job and Batch processes, does not support an upward modification of the current standard of 95%. Therefore, the Verizon proposal to maintain a 95% on-time performance for completion of all three types of hot cuts is approved.

iii) PR-9-02: % Early Cuts - Lines

This proposed sub-metric seeks to measure the occurrence of early hot cuts, i.e., lines cut prior to the beginning of the cut-over window, or cut after the order is cancelled. The issue of early cut-overs is a concern to CLECs as it could cause a customer's service to be disconnected. There are several aspects of this sub-metric where the parties disagree. First, the parties dispute whether troubles associated with early hot-cuts performed after an order has been

cancelled should be reflected in a hot cut metric (PR-9-02), as the alternate proposal recommends, or as a trouble reported on the retail service (UNE-P/Resale/UNE-L) prior to hot-cut, as Verizon would prefer. Second, the parties dispute several issues relating to whether PR-9-02 should be included in the NY C2C Guidelines, as some CLECs propose, or continue to be excluded from the NY C2C Guidelines, as Verizon would maintain. As Verizon points out, a similar sub-metric was removed from the C2C Guidelines once before.<sup>7</sup> The alternative proposal would measure the number of lines pending or cancelled that are prematurely disconnected (or disconnected in error). The CLECs suggest that reinstatement of this sub-metric is necessary to ensure "timely and error-free hot cuts" as required by the order.

Hot Cut orders that are cut-over early or cancelled during or after a defective cut-over by Verizon are considered in the PR-9-01 (% On-Time Performance) measurement. However, PR-9-01 measures only the performance of completed orders, and would not include orders that were cancelled prior to FDT, but where the line was still cut-over by Verizon. At issue here is whether a new metric is needed to measure instances when a Hot Cut order is legitimately cancelled prior to FDT but is still cut-over by Verizon, causing the customer to be disconnected. While we agree that the occurrence of a premature disconnect could be detrimental for business, CLECs have not demonstrated that the level of such instances is critical to warrant measurement. There is no indication that premature disconnections are likely to occur more frequently in the future or due to the Verizon Hot Cut processes approved in the order. However, as Verizon suggests, the CWG should review the

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<sup>7</sup> Case 97-C-0139, ORDER ADOPTING REVISIONS TO INTER-CARRIER SERVICE QUALITY GUIDELINES (issued December 15, 2000) Attachment A, page 9.

alternative proposal after operational experience in the various Hot Cut processes is monitored and the necessity to develop the measures for premature disconnects is validated. Therefore, the alternative proposal to expand the application of PR-9-02 to New York, and to modify the metric's exclusions, definitions and standards is rejected at this time.

iv) PR-9-03: % Large Job Hot Cut Project Negotiations Completed

The fundamental aspect of this new sub-metric, to measure the completion of Large Job negotiations within a time frame, was achieved by consensus of the group - the associated performance standard, however, was not. Although the term "negotiation" is used here, the process being measured is the request by a CLEC for a Large Job Hot Cut, specifying the central office, number of lines to be cut, due date and start time, and the response by Verizon with a proposed schedule. In the CWG collaborative Verizon ultimately proposed that Large Job negotiations be completed within five business days with a performance standard of 95%. The alternative proposal would require Verizon to respond to a request for a Large Job by the third business day (supported by all CLECs), with a 99.5% performance standard (supported by ATT, BridgeCom, Broadview, MetTel and MCI).

Although this is measuring primarily a manual process, we expect that the tasks necessary to fulfill its commitments can be easily achieved by Verizon. In current practice, Verizon is able to respond to CLECs with a proposed schedule on the same day a Large Job is requested. However, the likelihood of increased Large Job requests, a scenario expressed by the CLECS in the CWG, would support a longer negotiation interval. We find that a reasonable time for Verizon to respond to a CLEC request, even in situations where multiple Large Jobs involving multiple wire centers are requested simultaneously, is four

business days. With the longer interval we believe a performance standard higher than 95% is warranted, however, the 99.5% standard recommended in the alternative proposal is not reasonable when measuring processes that include manual tasks. Therefore, for PR-9-03 we will adopt a 98% standard within four business days for the time between a request for a Large Job and a Verizon response with a proposed schedule.

v) PR-9-04: % On Time Batch Due Date

In Verizon's Batch Hot Cut process, Hot Cut order requests for a particular central office are held until a critical mass is reached and all the orders are scheduled for cut-over on the "Batch" date. The interval between the order request and Batch date can be anywhere from 6 to 26 business days, depending on the central office and the number of requests received. Verizon, through WPTS, provides a minimum of six-days notice prior to the implementation of the Batch. To assure that batch dates are properly notified, the CLECs propose a new metric, PR-9-04, to measure WPTS Batch Hot Cut due date notification within 6 business days of the Batch and assign a 95% performance standard. Verizon objects to the alternative proposal claiming that it does not have the ability to measure activities required by the CLEC proposal and request that the CWG monitor actual operational experience before developing such a metric.

Though Batch is untested, notification of the Batch date is a critical step in the process and essential for CLECs to prepare for the cut-over. While certain processes may need to be developed to measure required activities, Verizon should be able to accomplish that relatively easily. It is reasonable for CLECs to expect Verizon's compliance with the six day notification of amended due date required in the batch process. Therefore, we adopt the alternative proposal to measure WPTS



batch hot cut due date notification within 6 business days of the batch and assign a 95% performance standard.

vi) PR-9-08: Average Duration of Hot Cut Installation Troubles

The consensus proposal included changes to this sub-metric that would allow its application to all three Hot Cut processes. Verizon proposed that rather than an absolute standard, its performance here be measured against its performance for the duration of Retail POTS installation troubles. It claims that repair time should be similar for both services as they entail similar work functions. An alternative proposal, supported by ATT, BridgeCom, Covad, Time Warner, MetTel, and MCI would support a benchmark standard of 95% in two hours. In support of the 95% benchmark standard, all CLECs claim that Verizon's use of retail comparison with POTS installation troubles is inappropriate. The alternative proposal also includes a performance standard that the cut-over disconnect time in a Batch Hot Cut not exceed 5 minutes.

We agree, as the CLECs propose, that troubles placed to the Hot Cut should be included in this measurement. However, we have no basis on which to judge the reasonableness of the alternative proposal, which includes a benchmark standard of 95% within 2 hours. As Verizon suggests, that it may not be possible to resolve a trouble within the 2 hour time frame if the technician is not at the location. Moreover, because this metric is similar to other mean time to repair metrics, a parity standard is a more reasonable approach. This sub-metric measures Hot Cut troubles on an aggregate basis against Retail POTS troubles. However, it is uncertain why the inclusion of troubles requiring dispatch to Verizon's outside plant is appropriate when such troubles are likely to be limited only to Basic Hot Cut troubles. Installation activities associated with Large Job and Batch Hot Cuts do not include outside plant

facilities so troubles are likely to be entirely contained within the central office.

Therefore, we will adopt Verizon's parity standard proposal at this time, but direct the CWG to further develop this metric to determine whether the inclusion of loop troubles and measuring performance on an aggregated basis are appropriate. Also, because no process exists to measure disconnect time for Batch Hot cuts the alternative proposal for a standard to measure Batch Hot Cut disconnects greater than 5 minutes is rejected.

vii) Glossary changes

The alternative proposal is to expand the definition of a "Coordinated Hot Cut" to include "reverse" hot cuts or "win-backs", i.e., when a loop is migrated from a CLEC to Verizon. Some CLECs argue that a hot cut should be defined similarly for a move from Verizon to a CLEC and from a CLEC to Verizon. The consideration of "reverse" hot cuts was contemplated in the order's requirement to develop appropriate measurements and standards, and its inclusion is not warranted at this time. Should a determination be made in the PFR to include such scenarios, the GWG will revisit its inclusion in the C2C Guidelines.

The alternative proposal would include EELs (Enhanced Extended Links) and Foreign Exchange Service in the Coordinated Hot Cut, Hot Cut - Basic, Hot Cut - Batch, and Hot Cut - Large Job glossary definitions. The inclusion of such circuits was not specifically required by the order, nor was the issue fully explored by CWG. We, therefore, reject the alternative proposal.

Verizon's proposes to exclude IDLC loops from the Hot Cut - Batch, and Hot Cut - Large Job glossary definitions is adopted. The Hot Cut processes approved in the case clearly limited IDLC loops to the Basic Hot Cut process.

CONCLUSION

The Commission approves the revisions to the Inter-Carrier Service Quality Guidelines that incorporate hot cut metrics and standards that were developed by the consensus determinations of the Carrier Working Group, and those determined in this order.

The Commission orders:

1. The consensus metrics and standards are adopted as modified and the non-consensus metrics and standards discussed in this Order are adopted consistent with our determinations set forth above.

2. Within 15 days of the date this Order is issued, Verizon New York Inc. shall file with the Secretary (20 copies) and serve upon each party the ordered corrections, changes and additions to the Guidelines Document.

3. This proceeding is continued.

By the Commission,

(SIGNED)

JACLYN A. BRILLING  
Secretary